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Teck

PROGRESS REPORT NO. 138

TO: Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig, Teck American Incorporated (TAI)

Cc: Denise Mills, TAI – via Email

DATE: January 12, 2018

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 138 Month Ending December 2017

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technologies Evaluation Study (SATES) – Following the completion of Phase 1A field work in October, sample processing and analysis began and continued in the month of December. TAI has been in communication with Kira Lynch, Superfund Technology Liaison – Office of Research and Development office of Science and Policy regarding format for data reporting and planning technical analysis by the team.

Benthic Macroinvertebrate Tissue Study – TAI is in receipt of a letter from EPA dated November 21, 2017 with comments on the draft data summary report (DSR). TAI responded to EPA's comments and revised the report and submitted of the draft final DSR to EPA on December 14, 2017 via electronic mail.

Plant Tissue Study – During the month of December, TAI continued work on development of the study data quality objectives, study design and the draft quality assurance project plan. TAI is in receipt of a memo titled Cultural Plant Sampling Recommendations, prepared by Lodestone Environmental Consulting for the Confederated Tribes of the Colville Reservation and dated September 20, 2017, updated December 9, 2017. TAI is evaluating the information in the memo as it relates to preparation of the draft quality assurance project plan for the study.



Background Soil Assessment – On October 2, 2017 a meeting was held between TAI and EPA to review the draft data quality objectives submitted to EPA on September 28, 2017. TAI continued working on follow up action items from the meeting.

Delineation of Upland Soil Site - On October 2, 2017 a meeting was held between TAI and EPA to review the draft data quality objectives submitted to EPA on September 28, 2017. TAI delivered Preliminary Draft Data Quality Objectives for the UCR RI/FS Delineation Study to EPA on December 14, 2017.

Baseline Ecological Risk Assessment (BERA) - October 10, 2017 TAI submitted a letter in response to EPA's August 23, 2017 letter regarding its review and determination of data usability for the BERA. On October 12, 2017 TAI submitted a letter to EPA with TAI's BERA sediment bioassay data evaluation approach. TAI is in receipt of a letter from EPA dated November 27, 2017 requiring TAI to provide EPA with the results of our evaluation using TAI's approach. TAI submitted a letter to EPA on December 22, 2017 with an attached technical memorandum titled Upper Columbia River Bioassay Data Analyses – Preliminary Results of the Concentration-Response Relationship Evaluation. The technical meeting planned for December 13, 2017 to discuss the approach and results was postponed until January 23-24, 2018 to allow EPA's technical team to review TAI's preliminary results.

At the time of writing, TAI is in receipt of a letter from EPA dated January 8, 2018 (received via electronic mail January 9, 2018) notifying TAI that EPA is defining the upper reaches of the riverine portion of the UCR Site as a separable operable unit (OU). Attached to the letter was a Level of Effort (LOE) for Nature and Extent of Sediment Contamination in Upper Reach OU. TAI is currently reviewing and evaluating the LOE.

BERA Toxicity Reference Value (TRV) Development – on November 29, 2017 a meeting was held in Seattle, WA with EPA, TAI and technical representatives for the Participating Parties for TAI to provide an update on fish dietary, wildlife, sediment and porewater TRV development. TAI followed up with an email to EPA on December 6, 2017 with details on the subjects discussed at the meeting and next steps for further discussion and goals for delivery of interim draft documents for the various TRVs. EPA responded in an email dated December 13, 2017 with responses from EPA and the Participating Parties regarding TAI's proposal. TAI responded to EPA in an email dated December 20, 2017 to address the comments and refine the schedule for upcoming meetings and goals for delivery of interim draft documents.

Human Health Risk Assessment (HHRA) – A call was held with EPA and TAI on December 11, 2017 to continue discussions around the Recreational Use Survey, Residential Soil Study letters to landowners, the updated conceptual site model, the chemicals of interest screen, definition of residential soil exposure units, the CCT Resource Use and Consumption Survey, and EPA's groundwater pathway assessment. On October 19, 2017 TAI submitted a letter to EPA titled "Additional Information on Teck American Incorporated (TAI) Technical Memo *Evaluation of*

Uncertainty in Daily Fish Consumption Metrics Generated from UCR Recreation Use Data (October 19, 2017).” Based on discussion with EPA, TAI followed up with a letter dated November 17, 2017 with additional information on the uncertainty analysis. TAI is in receipt of an SRC memo titled “Draft Response to TAI Uncertainty Analysis Proposal” from EPA (via electronic mail on December 7, 2017) and is reviewing and evaluating.

TAI is in receipt of December 18, 2017 email from EPA with documentation and a problem statement outline regarding the topic of northern pike in the UCR. TAI reviewed and evaluated the information and at the time of writing, had a call with EPA on January 9, 2018 to discuss preliminary questions and comments from TAI and path forward.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.